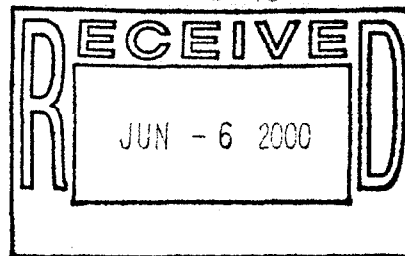




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May 31, 2000

The Office of Special Nutritionals (HFS-450)  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
200 C. Street S.W.  
Washington, DC 20204

Dear Sir/Madam:

This is a notification pursuant to 21 U.S.C. 343(r)(6) that Standard Process Inc., Palmyra, Wisconsin 53156-0904, is making the following statements:

- (1) Low zinc intake can dull the senses of taste and smell.
- (2) Zinc is an essential mineral that, among many other things, promotes a healthy immune system.
- (3) To ensure zinc stability and absorption, Standard Process binds the zinc to liver tissue proteins – the chelating agent of this particular product.
- (4) Zinc Liver Chelate strengthens the immune system.
- (5) The beta-carotene found in carrots is converted to vitamin A in the liver. Vitamin A, which also enhances immune function, is also found in animal liver. Beet root is rich in folic acid. Folic acid strengthens immune function by assisting in white blood cell formation and function.
- (6) Zinc Liver Chelate maintains cellular health.
- (7) Adequate amounts of zinc in the circulating blood cells work to stabilize cell membranes and increase intracellular efficiency. The vitamin A converted from carrot is a strong anti-oxidant that helps strengthen cell walls. Oat flour provides multiple nutraceutical and phytochemical constituents to support cellular health. Beets contain vitamins A, B2, and C, plus the mineral iron – all essential for maintaining healthy cells.
- (8) Glandular tissues support the corresponding organs in humans.

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These statements are made for a dietary supplement containing a proprietary blend of bovine liver, carrot (root), beet (root), dried beet (root) juice, and oat flour. Other ingredients include zinc liver chelate, honey, arabic gum, and calcium stearate. The name of the product is Zinc Liver Chelate.

The information contained herein is accurate and Standard Process Inc. has substantiation that the statements are truthful and not misleading.

Sincerely yours,

Ann Holden  
Standard Process Inc.

